

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
ON APPEAL FROM THE EXAMINER TO THE BOARD  
OF PATENT APPEALS AND INTERFERENCES**

In re Application of: Kaihu CHEN, et al.  
Serial No.: 10/066,036  
Filing Date: January 31, 2002  
Confirmation No.: 3956  
Group Art Unit: 2173  
Examiner: Namitha Pillai  
Title: **SYSTEM AND METHOD FOR ISOMORPHIC DATA-  
DRIVEN WEB PAGE GENERATION**

**Mail Stop Appeal Brief - Patents**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Sir:

**REPLY BRIEF**

Appellants appealed to this Board from the decision of the Examiner contained in a final Office Action mailed August 31, 2005 (the "Final Office Action"), finally rejecting Claims 1-16, and an Advisory Action mailed November 30, 2005 (the "Advisory Action"). Appellants filed an Appeal Brief on February 28, 2006 and a Revised Appeal Brief (the "Appeal Brief") on May 8, 2006. An Examiner's Answer (the "Examiner's Answer") was mailed July 28, 2006. Appellants respectfully submit this Reply Brief in response to the Examiner's Answer.

**REPLY**

Appellants' Appeal Brief sets out in detail why the claims under appeal are allowable and why the Examiner's final rejection of these claims should be reversed. Therefore, the following discussion focuses primarily on the specific points addressed in the Examiner's Answer.

**A. *Van Wyngarden* does not teach determining a data conversion specification associated with the user.**

As discussed in Appellants' Appeal Brief at pages 12-13, *Van Wyngarden* fails to teach, suggest, or disclose "determining a data conversion specification associated with the user." The Appeal Brief also illustrates how the Examiner's rejection of Claims 1-16 is a rapidly moving target. Initially, the Examiner argued that determining an IP address associated with a user identification string, sending the IP address to a remote computer, and allowing the remote computer to access and communicate on a local computer network using the IP address taught "determining a data conversion specification associated with a user." See Final Office Action, p. 2 (citing col. 1, ll. 19-28). Now, having apparently abandoned that argument, the Examiner relies on an argument introduced in her Response to Arguments, saying that "[t]he use of encryption in *Van Wyngarden* clearly teaches that conversion is occurring," and that "the encryption key would serve as the [data] conversion specification." Examiner's Answer, p. 6; see also Final Office Action, p. 4. In fact, the Examiner spends approximately two full pages of her Answer describing the operation of this encryption key. See Examiner's Answer, pp. 5-7. This is surprising, however, because *Van Wyngarden* only includes a fleeting reference to an encryption key. In fact, the words "encryption key" only appear once in the entire *Van Wyngarden* disclosure, in regard to a prior art authorization mechanism. According to *Van Wyngarden*, this authorization mechanism "generates an authorization ticket including the identified information encrypted with an encryption key derived from the password of the server." Col. 1, ll. 58-61. No other mention of the encryption key is made, and "encryption algorithm" does not appear at all.

Nonetheless, the Examiner argues that "[t]he encryption key is a specification that allows an encryption algorithm to encrypt the data from one format into another." Examiner's Answer, p. 6. However, the encryption key mentioned in *Van Wyngarden* is not

a data conversion specification as recited in the claims of the present application. As discussed in Appellant's Appeal Brief at page 13, data encryption and data conversion (as recited in the claims and described in the specification) are not the same thing. For example, Appellants' Specification discloses "[a] data conversion module 440 [that] is used . . . to convert data . . . from various protocols to a standard protocol." p. 15, ll. 15-16. Similarly, the Specification also discloses a data conversion specification (extensible stylesheet language file FS1) that "is applied to . . . XML data to effect a conversion of the XML data into another form [of XML data]. This may be necessary in some cases, since such XML data may come from a foreign source that uses a different set of XML tags, and this process converts them into a format that is acceptable to this system." p. 14, ll. 13-16. As such, it should be readily apparent to one of ordinary skill in the art that an encryption key is not a data conversion specification as recited in the claims of the present application and described in Appellants' specification. For at least this reason, the rejections of Claims 1-16 are improper.

Even assuming for the sake of argument that data encryption is synonymous with data conversion as recited in the claims of the present application, the Examiner's rejection is still flawed, as an encryption *key* is not a data conversion *specification*. The encryption key does not specify the type of encryption to be used, nor the algorithm for encrypting the data. As admitted by the Examiner, the key is merely a piece of information that "allows an encryption algorithm to encrypt the data." Examiner's Answer, p. 6. The encryption key, without the encryption algorithm, is worthless. Therefore, perhaps the Examiner meant to argue that an encryption algorithm, in combination with an encryption key, is a data conversion specification. However, as mentioned above, *Van Wyngarden* contains no disclosure regarding "encryption algorithms" whatsoever. Therefore, even assuming data encryption is synonymous with data conversion, the rejections of Claim 1-16 are still improper.

Another flaw in the rejections of Claim 1-16 is that the encryption key mentioned in *Van Wyngarden* is not "associated with the user," as required by the claims. According to the Examiner, "[a] encryption key that is associated with specific data that is associated with a specific user is a data conversion specification that is associated with a user." Examiner's Answer, p. 6. However, the Examiner fails to cite a single portion of *Van Wyngarden*

supporting her assertion that the encryption key is associated with specific data associated with a specific user. This is because there is none. *Van Wyngarden* merely discloses the encryption key is “derived from the password of the server.” Col. 1, ll. 60-61. As such, the encryption key is, at best, associated with the server, not the user. Moreover, the fact that the encryption key is used to encrypt client information included in the authorization ticket does not mean that the encryption key is “associated with the user.” In short, nothing in *Van Wyngarden* teaches that the encryption key is associated with the user. Therefore, for at least this additional reason, the rejections of Claims 1-16 are improper. Accordingly, Appellants respectfully request that the rejections of Claims 1-16 be reversed.

**B. *Van Wyngarden* does not teach determining a data representation specification associated with the user.**

As with the Examiner’s arguments regarding the “data conversion specification,” the Examiner’s arguments regarding “determining a data representation specification associated with the user” also appear to be a moving target. Initially, the Examiner identified the user identification string and an IP address mentioned in *Van Wyngarden* as being a data representation specification as recited in Claims 1-16. *See* Final Office Action, p. 2 (citing col. 1, ll. 19-28). The Examiner then argued, without designating the particular part of *Van Wyngarden* relied upon, that “information required by the client user” was a “data representation specification.” *See* Final Office Action, p. 5. Next, the Examiner argued that “determining a data representation specification associated with the user” was taught by a portion of *Van Wyngarden* that disclosed a “multi-access area” that has “at least two (2) levels of access, each of which is associated with [a] user ID and password.” *See* Advisory Action, p. 2 (citing col. 5, 15-25). Now, the Examiner argues that “[a] data representation specification is any data that defines the data that is viewable by the user,” and that *Van Wyngarden*’s “authorization ticket” and “managed information” meet this definition. Examiner’s Answer, p. 7. However, contrary to the Examiner’s assertion, neither the authorization ticket nor the managed information are a “data representation specification” as recited in Claims 1-16 and described in Appellants’ Specification. In fact, the Examiner’s

inability to settled on a portion of *Van Wyngarden* that allegedly supports her rejection only highlights the deficiency of the rejection.

As mentioned above, the authorization ticket described in *Van Wyngarden* is not a “data representation specification” as recited in Claims 1-16. In fact, *Van Wyngarden*’s authorization ticket does not even meet the Examiner’s own overly expansive definition of a data representation specification, *i.e.*, “any data that defines the data that is viewable by the user.” *See* Examiner’s Answer, p. 7. Instead, the authorization ticket merely includes an identification of a client and an identification of client information required by the server in association with an operation call. Col. 1, ll. 55-58. This information is encrypted with an encryption key and sent to the server so that it can obtain the client information directly. Col. 1, ll. 58-64. The authorization ticket does not “define data that is viewable by the user,” as claimed by the Examiner. As such, the Examiner misinterprets *Van Wyngarden*’s disclosure. Instead, the authorization ticket in *Van Wyngarden* merely includes information used by the server to determine the client access rights (stored on the server) corresponding to the user. *See* col. 1, ll. 49-64. The authorization ticket has nothing to do with the “look-and-feel” of the data presented to the user. *See* p. 14, ll. 27-30. As such, *Van Wyngarden*’s authorization ticket is not a “data representation specification” as recited in Claims 1-16.

Similarly, the *Van Wyngarden*’s “managed information” is also not a “data representation specification.” In support of this rejection, the Examiner cites a portion of *Van Wyngarden* that discloses providing multi-level managed information on a website, “such that a selected password provides user access to all of the managed information and another selected password provides user access to a limited portion of the managed information.” Col. 3, ll. 9-12. However, as discussed in Appellants’ Appeal Brief at page 14, password-restricting a portion of a website is not “determining a data representation specification associated with the user.” Again, the “managed information” has nothing to do with the “look-and-feel” of the data presented to the user. *See* p. 14, ll. 27-30. As such, *Van Wyngarden*’s managed information is not a “data representation specification” as recited in Claims 1-16.

Moreover, the “managed information” cited by the Examiner is not “associated with the user” as recited in Claims 1-16. Instead, the different portions of the managed

information are associated with different passwords. *See* col. 3, ll. 9-12. These passwords, however, are not described as being associated with any particular users. Therefore, for at least this reason, as well as those discussed above, the rejections of Claims 1-16 are improper. As such, Appellants respectfully request that the rejections of Claims 1-16 be reversed.

**C. *Van Wyngarden* does not teach converting and presenting each of the subset of elements.**

As discussed in Appellants' Appeal Brief at pages 14-15, *Van Wyngarden* also fails to teach, suggest, or disclose "converting and presenting each of the subset of elements [the user is authorized to access]." Nothing in the Examiner's Answer controverts this showing. Instead, the Examiner continues to argue that that same authorization ticket she cites as teaching "determining a data representation specification associated with the user" also teaches "converting and presenting each of the subset of elements [the user is authorized to access]." This is clearly incorrect, however, as the authorization ticket is not a subset of elements, referenced by the webpage, that the user is authorized to access. Instead, the authorization ticket merely contains information about -- not viewable by -- the user. *See* col. 1, ll. 49-64. Moreover, the authorization ticket is accessible only by the server, which decrypts the authorization ticket to obtain the client information it requires. *Id.* In fact, the portion of *Van Wyngarden* cited by the Examiner as supposedly teaching that the authorization ticket, or the information contained therein, are viewable by the user, are not about the authorization ticket at all. *See* col. 5, ll. 19-23. Instead, this portion refers to the general access area of a multi-level managed access website, not the authorization ticket. As such, the Examiner's arguments are clearly flawed. For at least this additional reason, the rejections of Claims 1-16 are improper. Therefore, Appellants respectfully request that the rejections of Claim 1-16 be reversed.

**CONCLUSION**

Appellant has demonstrated that the present invention, as claimed in Claims 1-16, is patentably distinct from the references of record in this Application. The Examiner's Answer does not in any way controvert Appellants' showing. Accordingly, Appellants respectfully request the Board to reverse the Examiner's final rejection of Claims 1-16 and to instruct the Examiner to issue a Notice of Allowance of these Claims.

Although Appellant believes no fee is due in connection with this Reply Brief, the Commissioner is hereby authorized to charge any fee or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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